

**MICHAEL UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

FORTRA LLC and ECRIME
MANAGEMENT STRATEGIES, INC. d/b/a
PHISHLABS,

Plaintiffs,

v.

DOPPEL INC. and PATRICK LELAND,

Defendants.

Case No.: 2:25-cv-03783-DCN

**PLAINTIFF'S ANSWERS TO
LOCAL CIVIL RULE 26.01 INTERROGATORIES**

COMES NOW Plaintiffs, by and through undersigned counsel, and make the following initial disclosures pursuant to Local Rule 26.01 as follows:

- (A) *State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.*

ANSWER: Plaintiffs are unaware of any other persons or entities that may have a subrogation interest as to any claim in this matter.

- (B) *As to each claim, state whether it should be tried by jury or nonjury and why.*

ANSWER: Plaintiffs' claims should be tried by jury, as such claims are triable by jury and Plaintiffs have demanded a jury trial on all counts in the Complaint.

- (C) *State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.*

ANSWER: Plaintiffs are not publicly owned, and no owner of ten percent or more of the outstanding shares of either Plaintiff are publicly owned companies.

- (D) *State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).*

ANSWER: The instant action is filed in this Division on the basis that one of the Defendants (Defendant Leland) resides within this Division and some or all of the actions of Defendants complained of in the Complaint occurred within this Division.

- (E) *Is this action related to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.*

ANSWER: This action is not related to any other matter filed in this District.

Respectfully submitted this 5th day of May 2025.

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

s/ Michael Oliver Eckard

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